

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

GLAXOSMITHKLINE BIOLOGICALS SA)	
and GLAXOSMITHKLINE LLC,)	
)	
Plaintiffs,)	
)	
v.)	C.A. No. 24-512 (GBW)
)	
PFIZER INC., PHARMACIA & UPJOHN)	
CO. LLC, BIONTECH SE, BIONTECH)	
MANUFACTURING GMBH, and)	
BIONTECH US INC.,)	
)	
Defendants.)	

STIPULATION AND [PROPOSED] ORDER

IT IS HEREBY STIPULATED by the parties, subject to the approval of the Court, as follows:

- (1) the deadline for Defendants to comply with Special Master Squire's October 20, 2025 Memorandum Opinion and Order (D.I. 116) granting in part Plaintiffs' motion to compel (D.I. 114) is extended to December 8, 2025;
- (2) Defendants will make rolling productions of materials subject to Special Master Squire's October 20, 2025 Memorandum Opinion and Order (D.I. 116) prior to December 8, 2025; and
- (3) the parties are negotiating the search protocol Defendants will use to find materials related to the Asserted Patent Relatives, and Plaintiffs reserve the right to raise a dispute regarding the appropriate scope of the search terms if the parties have not reached agreement before November 14, 2025.

RICHARDS, LAYTON & FINGER, PA

/s/ Kelly E. Farnan

Kelly E. Farnan (#4395)
Sara M. Metzler (#6509)
One Rodney Square
920 North King Street
Wilmington, DE 19801
(302) 651-7700
farnan@rlf.com
metzler@rlf.com

*Attorneys for Plaintiffs GlaxoSmithKline
Biologicals SA and GlaxoSmithKline LLC*

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

/s/ Anthony D. Raucci

Jeremy A. Tigan (#5239)
Megan E. Dellinger (#5739)
Anthony D. Raucci (#5948)
1201 North Market Street
P.O. Box 1347
Wilmington, DE 19899
(302) 658-9200
jtigan@morrisnichols.com
mdellinger@morrisnichols.com
araucci@morrisnichols.com

*Attorneys for Defendants Pfizer Inc., Pharmacia
& Upjohn Co. LLC, BioNTech SE, BioNTech
Manufacturing GmbH, and BioNTech US Inc.*

November 7, 2025

SO ORDERED this 7th day of November, 2025.



Special Master Monté T. Squire